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October 5, 2017

VIA ECF

The Honorable George B. Daniels
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1310
New York, NY 10007

Re: **Tantaros v. Fox News Network, LLC, et al., No. 17-cv-2958 – Initial
Conference and Substitution of Counsel for Plaintiff**

Dear Judge Daniels:

Our firm recently substituted into the above-referenced action as new counsel for the Plaintiff, Andrea Tantaros, and we are writing in regards to the initial conference scheduled on October 12, 2017.

On September 29, 2017, we filed an appearance as new counsel for Ms. Tantaros, replacing Judd Burstein and Judd Burstein, P.C. Mr. Burstein's Motion to Withdraw as Attorney for Plaintiff (ECF No. 87), in which he requests a 60-day stay of this action, is currently pending before Your Honor.

We agree with Mr. Burstein's request, as we believe we will need at least 60 days to familiarize ourselves with this case in order to fully and dutifully represent Ms. Tantaros' interests. In an effort to help move things along, we conferred telephonically with counsel for Defendants regarding the pending request. All counsel consented to a 60-day stay. However, some counsel expressed a preference to keep the October 12 date, based on what they described as past difficulties in coordinating everyone's schedule and arriving at a consensus.

On behalf of Ms. Tantaros, we do not object to this suggestion; however, having just been retained, we would not be in a position to argue or meaningfully participate in any discussion of the four motions that have been filed to date.¹ Of course, if a conference

¹ The motions are as follows: (1) Motion for Sanctions Pursuant to Fed. R. Civ. P. 11(c), filed by Defendants Irena Briganti, Fox News Network LLC, and William Shine (the "Fox News Defendants") (ECF No. 18); (2) Amended Motion to Compel Arbitration, filed by the Fox News Defendants (ECF No. 25); (3) Motion Seeking Sanctions Pursuant to Rule

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occurs, we will be prepared to attend and discuss preliminary matters.²

Accordingly, we respectfully request that, if Your Honor rules that the conference will proceed on October 12, Your Honor will not hear oral argument on the pending motions on that date and, instead, will schedule such argument for a date at least forty-five (45) days after October 12, 2017.

Respectfully submitted,

/s/ Martha B. Stolley
Martha B. Stolley

cc: Counsel of Record

11, filed by Defendants Disruptor, Inc. and Peter A. Snyder (“Disruptor Defendants”) (ECF No. 38); and (4) Motion to Dismiss or, Alternatively, to Compel Arbitration, filed by the Disruptor Defendants (ECF No. 41).

² We also note that, on October 4, 2017, Plaintiff filed a Motion to Join the Estate of Roger Ailes as a Defendant pursuant to Rule 20 of the Federal Rules of Civil Procedure. After Mr. Ailes passed away on May 18, 2017, Mr. Burstein voluntarily dismissed the claims against him without prejudice. Since then, an administrator was appointed to oversee the Ailes estate and Ms. Tantaros now seeks to join the estate in this action. Should the Court grant Plaintiff’s pending Motion to Join the Estate of Roger Ailes, the initial conference would benefit from the attendance of the Ailes Estate’s counsel.